

Exhibit W

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Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIROUZ SEDAGHATY,

Defendant.

CR 05-60008 HO

**DEFENDANT'S FOURTH
AMENDED POTENTIAL EXHIBIT
LIST**

Defendant, Pirouz Sedaghaty, by and through his attorneys, Lawrence Matasar and Federal Public Defender Steven T. Wax, hereby submits the following Fourth Amended List of Potential Exhibits.

Trial Ex. #	Exhibit Description
0601	Constitution of Al Haramain Islamic Foundation (Saudi Arabia)
0602	Monthly report and statement of purpose (PF)
0602(A)	Monthly Report and Statement of Purpose Declaration of Cooperation Statement between Qu'ran Foundation and Al Haramain Foundation March 6, 1998
0602(B)	Signed Statement of Purpose Declaration of Cooperation Statement between Qu'ran Foundation and Al Haramain Foundation
0602(C)	Statement of Purpose and Declaration of Cooperation between Qu'ran Foundation and Al Haramain Islamic Foundation with printed signatures Solimon Al Buthe, Abu Unus, Dawood Rodgers, and Robert L. Brown
0603	Letter March 31, 1998, Qu'ran Foundation to Al Haramain Foundation
0604-0605	Reserved
0606	Email January 1, 2000, 2:37 p.m. P to Al Buthe
0607	Photograph Pete Seda and Solomon Al Buthe under tree
0608	Photograph Pete Seda, Rob Brown, John Dunn and David Rodgers
0609	Photograph including Rob Brown, David Rodgers, and Pete Seda

0610 Photograph of 3800 S Highway 99 with camel

0611 Photograph of cultural tent at 3800 South Highway 99

0612 Photograph Al Haramain building

0613 Photograph of David Rodgers with King Abdullah

0614 Email June 26, 2000 AQ to b@qf.org on his trip - and extremism

0614(A) Attachment to June 26 2000 email June 25, 2000 Al Buthe to AQ

0615-0627 Reserved

0628 December 2, 1999, article from NY TIMES "McCain Urges Ending Aid To Russia In Wake Of Chechen Policy"

0629 ABC News.com page, December 9, 1999, "Yeltsin Lashes Out"

0630 THE INDEPENDENT web page December 11, 1999, "In A Powerless, Frozen City Of No Food, The Blind Hear The Bombs And Know There Is No Escape; Sarah Richards Toured Chechnya's Capital As Russian Forces Closed In, And Was Among The Last To Leave." **[replaced with different version]**

0631 TIME webpage December 13, 1999, "Campaign 2000: Foreign Policy: Where McCain Hits Bush The Hardest"

0632 Doctors Without Borders webpage December 15, 1999, "Chechnya: The Tracking of Civilians"

0633 CNN.com webpage December 16, 1999, "Albright Delivering 'strong message' to Russia"

0634 Email December 29, 1999 at 5:20 a.m., Raya Shokatfard to 1z@qf.org, with CNN.com webpage December 18, 1999, "Russian Bombardment Intensifies As Troops Close On Grozny" **[replaced with a complete version]**

0635 Webpage The Gazette, February 6, 2000, "Escape From Chechnya" **[replaced with different version]**

0636 Reserved

0637 Email February 17, 2000 at 1:02 a.m., Q to AQ with CNN webpage February 16, 2000, "NATO, Russian Relax Tense Relations" **[replaced with a complete version]**

0638 Reserved

0639 Article Ria Novosti February 28, 2000, "Saudi Arabia to Provide Humanitarian Aid For Refugees"

0640 Human Rights Watch Report February 29, 2000, "War Crimes In Chechnya And The Response Of The West"

0641 Email February 21, 2000 at 11:34 p.m. The Arborist to b at qf.org with CNN.com February 21, 2000 Russia Chechnya webpage **[replaced with a complete version]**

0642 CNN.com Website Pages March 22-31, 2000

0643 UN Commission on Human Rights Resolution of April 25, 2000

0643(A) United Nations Foundation U.N. wire April 26, 2000, "U.N. Seeks Inquiry Into Violations In Chechnya"

0644 MSF-USA special report, November 22, 2000, Chechnya, The Politics Of Terror

0645 United Nations High Commissioner for Human Rights Resolution 2001/24

0646 U.S. Senate Committee on Foreign Relations, Joseph R. Biden, February 12, 2004

0647 State Department Russia Country Report 1999

0648 State Department Russia Country Report 2000

0649 State Department Russia Country Report 2001

0650 NY Times 10/30/99 "Fears Rise for Chechen Refugees as Winter Nears"

0651 Reserved

0652 Congressional Research Service Report for Congress: Chechnya Conflict: Recent developments (May 3, 2000)

0653 News article U.S.: Chechen Officials Hold Talks at State Department (February 2, 2000)

0654 Time.com News Article, Why Russia May Keep Chechen Capital in Ruins (February 7, 2000)

0656-0663 Reserved

0664 Email September 18, 2001 from Florin to Pete Seda plus attachment

0664(A) September 21, 2001, 9:25 a.m. P to Council of American Islamic Relations plus attachment

0665 Email September 21, 2001, 9:33 a.m. P to CIC@cicnow.com

0666 - 0667 Reserved

0668 Bank of America Check and traveler's check purchase

0669 Email January 11, 2000, 14:38:08 S. El Fiki to Haramain

0670 Email January 18, 2000, Haramain to S. El Fiki

0671 Email February 21, 2000, 9:12 a.m. head office to S. El Fiki

0672 February 21, 2000, Letter Aqeel to S. El Fiki

0673 February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait

0673(A) English translation of February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait

0673(B) Declaration of Translation of February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait

0674 Email February 24, 2000 P to Al Buthe RE money transferred

0675 Reserved

0676 Email March 27, 2000, 8:36 a.m. Al Haramain to S. El Fiki

0677 Letter April 13, 2000, Mahmoud T. El Fiki from National Bank of Kuwait

0678 Redacted Federal Bureau of Investigation 302 interview report of Mahmoud Talaat El Fiki, investigation on January 31, 2005

0679 Kuwait Bank record for El Fiki

0680 Email May 11, 1999 Barhoush to Haramain et al Subject: Urgent Albanian Translation

0680(A) Email Abdul Qadir to Haramain May 11, 1999 Report of Committee on Albania

0681 Email December 11, 1999, Abdul Qadir to Qur'an and Sunnah Net Group; Jeddah-Net@muslimsonline.com

0682 Email December 28, 1999, 4:26 p.m. from Info to Info@irw.org

0683 Email December 30, 1999, 8:50 p.m. P to Al Buthe

0683(A) Attachment to email Statement in Spanish and English from Ayuda Internacional Al Desplazado

0683(B) Email from Al Buthe to P December 31, 1999 Human Help for Chechnya

0683(C) Email January 1, 2000 1:46 P to Al Buthe RE Horrible Condition

0683(D) Email from Al Buthe to P, January 2, 2000 at 4:58 AM

0684 Email from Head Office to Bilal Ibrahim with cc to Pete, January 3, 2000 at 3:10 AM

0685 Email from Abdul-Qadir to q@qf.org, January 4, 2000 at 1:00 AM

0685(A) Email attachment January 4, 2000 at 1:00 AM

0686 Email January 6, 2000, 1:35 a.m. Al Buthe to P

0686(A) Email January 6, 2000, 1:37 a.m. Al Buthe to P

0686(B) Email January 7, 2000, 3:48 p.m. Info to Info@irw.org

0686(C) Email January 12, 2000, 5:43 p.m. Info to Info@irw.org

0687 Email Daveed Gartenstein-Ross to P January 17, 2000

0687(A) Email P to Daveed Gartenstein-Ross January 17, 2000

0687(B) Email Chain P to B February 21, 2000, including Daveed Gartenstein-Ross to P 1/17/2000 RE Horrible Condition and P to Al Buthe 1/1/2000 RE Horrible Condition

0687(C) Email P to Daveed Gartenstein-Ross January 18, 2000 plus attachment

0687(D) Email P to Daveed Gartenstein-Ross January 18, 2000

0688 Email Ashland to Al Buthe January 18, 2000

0688(A) Email January 22, 2000, 11:23 p.m. Ashland to Al Buthe

0689 Letter January 24, 2000, Pete Seda to Responsible Secretariat of Federation Committee for International Technical Humanitarian Cooperation

0689(A) Email January 27, 2000, 10:08 a.m. Info to Info@irw.org

0690 Email AQ to Sheeshan February 3, 2000

0691 Email P to Daveed Gartenstein-Ross February 4, 2000

0691(A) Email P to Daveed Gartenstein-Ross February 8, 2000

0692 Email Q to AQ February 12, 2000

0692(A) Email from Q to Sunnah, February 12, 2000, with path to Time.com, Photo Essay RE: Grozny

0692(B) Photographs Time.com photo essay, Russian Soldiers Rest in Downtown Grozny

0692(C) Blinded and Bound, Chechen Civilians

0692(D) Chechen Men in Pit

0692(E) Chechen Boy in Cellar

0692(F) Chechen Woman with Son

0692(G) Fallen City

0693 Email P to Al Buthe February 15, 2000

0693(A) Email The Arborist to Al Buthe February 17, 2000

0693(B) Email P to B February 19, 2000

0693(C) Email P to Al Haramain February 20, 2000

0694 Email February 20, 2000 The Arborist to b@qf.org

0694(A) Email P to MCA February 21, 2000 11:40

0694(B) Email February 21, 2000, 11:34 p.m. from The Arborist to B@qf.org

0694(C) Email February 21, 2000, 10:54 a.m. The Arborist to B@qf.org

0694(D) Email February 21, 2000 5:48 p.m. The Arborist to B
[replaced with different version]

0694(E) Web page Medecins Sans Frontieres

0694(F) Web page United Nations

0695 Email Chain P to B February 21, 2000 including P to Daveed Gartenstein-Ross 2/19/2000 and Daveed Gartenstein-Ross to P 2/8/2000 RE: Chechnya

0696 Email AQ to Sheeshaan February 23, 2000

0697 Email February 29, 2000, 12:16 p.m. P to B@qf.org

0697(A) Email Q to PJFlorin February 29, 2000

0697(B) Email P to B March 1, 2000

0698 Memorandum March 1, 2000, Catherine Granel from Bilal Abdul-Kareem, "Aid to the People of Chechnya"

0698(A) Email Q to Granel March 1, 2000 with Memo to Bilal

0698(B) Web Page Doctors of the World Staff 2000

0698(C) Email March 1, 2000, 10:55 a.m. Q to P@qf.org

0698(D) Email March 1, 2000, 11:29 a.m. P to PJFlorin@jeffnet.org

0698(E) Letter March 1, 2000 Bilal to Catherine Granel RE: Aid to the people of Chechnya

0698(F) Email March 1, 2000 P to Q RE: Letter to Doctors

0698(G) Letter Attachment to March 1, 2000 email Subject: Aid to the People of Chechnya

0698(H) Email Q to The Arborist March 3, 2000

0699 Email P to Al Buthe March 3, 2000

0699(A) Email March 4, 2000 p to q@qf.org

0699(B) Attachment to Email March 4, 2000

0700 Email March 5, 2000 P to b@qf.org FW: I need your help!

700(A) Web printout, World Food Program, Azerbaijan, printed February 29, 2000

700(B) Web printout, World Food Program Delivers - The Balkans, printed February 29, 2000

700(C) Web printout, World Food Program Bread Story - Kosovo, printed February 29, 2000

700(D) Web printout, World Food Program Logistics Photo Gallery, picture of airplane dropping food, printed March 1, 2000

700(E) Web printout, World Food Program Logistics Photo Gallery, picture of helicopter, printed March 1, 2000

700(F) Web printout, World Food Program Logistics Photo Gallery, picture of truck convoy, printed March 1, 2000

700(G) Web printout, World Food Program Logistics Photo Gallery, picture of loaded truck, printed March 1, 2000

0701 Email March 15, 2000 from Info to Harith RE Eid Mubarak

0701(A) April 2, 2001, 9:58 a.m. CIC@cicnow.com

0702 - 0703 Reserved

0704(A) Al Haramain Islamic Foundation receipt No. 262740

0704(B) English translation of Al Haramain Islamic Foundation receipt No. 262740

0705(A) Al Haramain receipt no. 263867

0705(B) English translation of Al Haramain receipt no. 263867

0706(A) Al Haramain log page of receipts no. 262740 & 263867

0706(B) English translation of Al Haramain log page of receipts no. 262740 & 263867

0707(A) Affidavit of Al Haramain Islamic Foundation, executed May 3, 2004

0707(B) Certificate of translation of Affidavit of Al Haramain Islamic Foundation, executed May 3, 2004

0707(C) English translation of Certificate of translation of Affidavit of Al Haramain Islamic Foundation, executed May 3, 2004

0708 - 0712 Reserved

0713 Al Suwailem Declaration

0714(A) Diwan Presidency of Counsel of Ministers

0714(B) English translation of Diwan Presidency of Counsel of Ministers

0715(A) Diwan memo to His Royal Highness Minister of Interior re: Chechen Relief and SJRC

0715(B) English translation of Diwan memo to His Royal Highness Minister of Interior re: Chechen Relief and SJRC

0716(A) Kingdom of Saudi Arabia, Saudi Joint Relief Committee (SJRC) for the Aid of the People of Kosovo

0716(B) English translation of Kingdom of Saudi Arabia, Saudi Joint Relief Committee (SJRC) for the Aid of the People of Kosovo

0717(A) Memo to His Excellency Minister of Finance and National Economy

0717(B) English translation of Memo to His Excellency Minister of Finance and National Economy

0718(A) Order of King Fahad Bin Abdulaziz Al-Saud

0718(B) English translation of Order of King Fahad Bin Abdulaziz Al-Saud

0719(A) Al Haramain Humanitarian Foundation memorandum November 4, 1999

0719(B) English translation of Al Haramain Humanitarian Foundation memorandum November 4, 1999

0720(A) Telegram to the Minister of the Interior, re: Saudi Joint Committee November 10, 1999

0720(B) English translation of Telegram to the Minister of the Interior, re: Saudi Joint Committee November 10, 1999

0721(A) Minutes of meeting of the Chechnya Committee/Saudi Joint Relief Committee January 1, 2000

0721(B) English translation of Minutes of meeting of the Chechnya Committee/Saudi Joint Relief Committee January 1, 2000

0722(A) Memo from Al Haramain Charity Foundation January 4, 2000

0722(B) English translation of memo from Al Haramain Charity Foundation January 4, 2000

0723(A) Report of Saudi Joint Relief Committee for Kosovo and Chechnya (Chechnya Committee) February 15, 2000

0723(B) English translation of Report of Saudi Joint Relief Committee for Kosovo and Chechnya (Chechnya Committee) February 15, 2000

0724(A) Brief report what Chechnya Committee has achieved abroad

0724(B) English translation of brief report what Chechnya Committee has achieved abroad

0725(A) Declaration of Vladimir Matusevitch August 23, 2004

0725(B) Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya in Russian and Arabic

0725(C) English translation from Arabic of Memo of Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya

0725(D) English translation from Russian of Russian and Arabic language version of Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya

0725(E) Russian language version of Certificate 9927 of the State Registration Chamber

0725(F) English translation of Certificate 9927 of the State Registration Chamber

0726(A) Telegram regarding Al Haramain, Chechnya and Saudi Joint Relief Committee June 2, 2003

0726(B) English translation of Telegram regarding Al Haramain, Chechnya and Saudi Joint Relief Committee June 2, 2003

0727(A) Telegram to Al Rajhi Banking and Investment Corporation March 14, 2004

0727(B) English translation of Telegram to Al Rajhi Banking and Investment Corporation March 14, 2004

0728(A) Confirmation from Minister of Justice regarding Al Haramain Islamic Foundation March 21, 2004

0728(B) English translation of Confirmation from Minister of Justice regarding Al Haramain Islamic Foundation March 21, 2004

0729(A) Statement from Al Haramain Charity Foundation May 3, 2004

0729(B) English translation of Statement from Al Haramain Charity Foundation May 3, 2004

0730 Unclassified summary regarding monies destined for needy Chechen families

0731 Al Haramain Website list of Al Haramain bank accounts

0732 - 0747 Reserved

0748 Handwritten document captioned "Wire Transfer" top line \$2767

0749(A) Email December 30, 1999 8:20 a.m. Tom to Pete Seda

0749(B) Proposal attachment to email: Letter Tom Wilcox to Pete Seda December 30, 1999

0750 Engagement letter from Tom Wilcox to Pete Seda

0751 Handwritten list, top line 2/24/2000 Mahmoud T. El Fiki

0752 Check #9733 June 23, 2000

0753 Check #9733 6/23/2000

754.42318 2000 Form 990

754.42335 2000 State CT-12 Return

754.42477 2001 Form 990

754.42494 2001 State CT-12 Return

754.42532 Letter from Internal Revenue Service to Al Haramain dated September 2, 2002

754.42533 Letter from Internal Revenue Service to Al Haramain dated February 20, 2002

754.42540 Letter from OR DOJ to Al Haramain dated October 30, 2001

754.42659 Letter from OR DOJ to Al Haramain dated June 19, 2001

754.42703 Letter from OR Dept of Revenue to Al Haramain dated August 8, 2000

754.42810 Letter from Internal Revenue Service to Al Haramain dated May 31, 2002

754.42895 Letter from OR DOJ to Al Haramain dated February 22, 2001

754.42896 1999 Form 990

754.43005 1998 Corporate Return Form 1120

754.43014 Oregon Corporation excise tax return 1998

754.43075 Letter from Internal Revenue Service to Al Haramain dated December 7, 2000

754.43104 Letter from Internal Revenue Service to Al Haramain dated October 13, 2000

754.43111 Letter from Tom Wilcox to OR DOJ dated September 22, 2000

754.43112 Letter from OR DOJ to Al Haramain dated September 7, 2000

754.43127 Letter from Tom Wilcox to Internal Revenue Service dated September 25, 2000

754.43129 Letter from Internal Revenue Service to Al Haramain dated September 6, 2000

754.43156 Letter from Tom Wilcox to Internal Revenue Service dated August 17, 2000

754.43158 Letter from Internal Revenue Service to Al Haramain dated March 24, 2000

754.43193 1023 Application

754.43219 Letter from OR DOJ to Al Haramain dated January 14, 2004

754.43220 Letter from Internal Revenue Service to Al Haramain dated February 9, 2004

754.43238 Letter from Internal Revenue Service to Al Haramain dated March 16, 2000

754.43252 Letter from OR DOJ to Al Haramain dated July 26, 2000

754.43257 Letter from OR DOJ to Al Haramain dated April 11, 2000

754.43337 Letter from Internal Revenue Service to Al Haramain dated December 22, 2003

754.43340 Letter from OR DOJ to Al Haramain dated November 21, 2003

754.43341 Letter from OR DOJ to Al Haramain dated October 16, 2003

754.43356 Letter from OR DOJ to Al Haramain dated June 4, 2003

754.43360 Letter from OR DOJ to Al Haramain dated April 4, 2001

754.43411 Letter from OR DOJ to Al Haramain dated October 30, 2000

754.43433 Letter from Tom Wilcox to Internal Revenue Service dated January 3, 2002

754.43434 Letter from Internal Revenue Service to Al Haramain dated December 31, 2001

754.43437 Letter from Tom Wilcox to Internal Revenue Service dated October 2, 2001

754.43438 Letter from Internal Revenue Service to Al Haramain dated September 24, 2001

754.43447 Letter from OR DOJ to Al Haramain dated August 24, 2001

754.43459 1999 State CT-12 Return

754.43462 Letter from Tom Wilcox to OR DOJ dated January 8, 2001

754.43487 Letter from Internal Revenue Service to Al Haramain dated February 4, 2000

754.43512 Letter from Internal Revenue Service to Al Haramain dated June 1, 2000

754.43660 Letter from Internal Revenue Service to Al Haramain dated April 18, 2001

755.1 Email from P to Tom Wilcox, May 14, 2001

755.2 Attachment to 755.1 - QuickBooks File

755.3 Floppy Disk from Tom Wilcox, Labeled "Al Haramain 6/14/2001"

755.4 QuickBooks file located on 755.3

755.5 Email January 7, 2002 from Tom Wilcox to P

755.6 Attachment to 755.5 - QuickBooks File

755.7 Jeff Cone, Audit Trail, January 1999 through December 2003 **[first page has been redacted]**

755.8 Jeff Cone, Financial Statement Transactions: QuickBooks Audit Report Emulation

755.9 Email March 13, 2001 from Tom Wilcox to Pete Sedda

755.10 Attachment to 755.9 - QuickBooks File

755.11 Email June 12, 2001 from P to Shoumar, Abdulaziz S (rrd)

755.12 Attachment to 755.11 - QuickBooks File

755.13 September 19 - 24 Wilcox Data Entry Report

0756 Email January 2, 2000, 1:13 p.m. P to Ms. Katkhouda

0757-0758 Reserved

0759 Email February 26, 2000, 12:45 a.m. from Al Buthe to P@qf.org

0760 Email March 6, 2000 Al Shoumar to q@qf.org

0760(A) Attachment to Email March 6, 2000 Al Shoumar to q@qf.org

0761 Email from Q to P March 7, 2000, Six months budget with attachment

0762 Email from P to Shoumar January 3, 2001 RE springfield@Al Haramain.org

0763-0800 Reserved

0801 Email April 1, 2000, 3:07 p.m. P to Raya Shokatford

0802 Letter Proposal April 11, 2000, Pete Seda

0803(A) Email April 12, 2000, 11:57 a.m. PJFlorin@jeffnet.org to Pete Seda

0803(B) Draft greetings letter.doc attached to email

0803(C) Draft public relations letter re Islam attached to email

0803(D) Draft Greeting Letter (PF)

0803(E) Draft greeting letter (short version) PF

0803(F) Letter April 11, 2000 Public relation plan (PF)

0804(A) Email April 18, 2000, 3:05 p.m. PJFlorin @jeffnet.org to Pete Seda

0804(B) Draft Jewish Community letter attached

0804(C) Draft anti-terrorism letter to Sheik Aqeel attached to April 11, 2000, email

0804(D) Letter to April 18, 2000 to Rabbi Zaslow (PF)

0804(E) Letter April 18, 2000 to Rabbi Sirinski (PF)

0805(A) Email April 19, 2000 12:46 a.m. Ashland to Al Buthe

0805(B) Attachment to email, Letter April 19, 2000, Pete Seda to Aqeel al Aqeel

0806 Letter April 19, 2000, Pete Seda to Aqeel al Aqeel

0807 Email July 5, 2000, 11:52 a.m. PJFlorin@jeffnet.org to Pete Seda plus attachment

0807(A) Draft letter to Shiukh (PF)

0808 ASHLAND DAILY TIDINGS September 15, 2001

0809 Letter September 18, 2001, Al Haramain Foundation, signed by Pete Seda, to Office of Emergency Relief, City of New York

0809(A) Letter September 18, 2001 to NYC (PF)

0810 Letter September 18, 2001, Pete Seda to State Department

0810(A) Draft September 2001 Justice for All (PF)

0810(B) Draft September 2001 Justice for All (PF)

0811 Letter September 18, 2001, Pete Seda to Office of Emergency Relief

0812 Letter September 20, 2001, Pete Seda to My Dear Brothers and Sisters, Call for Islamic Outreach

0812(A) Call For Islamic Outreach (PF)

0813 Letter to State Department 9/18/2001 (PF)

0813(A) Letter September 20, 2001, Secretary of Health and Human Services, Tommy Thompson, from Pete Seda

0814 Mail Tribune article, September 20, 2001

0815 Letter to the Editor by Pete Seda

0815(A) Press Release "From The Muslim Heart" (PF)

0816 Email September 21, 2001, 9:15 p.m. Marisa Petersen to Qur'an Foundation

0817 Email September 23, 2001, 10:59 a.m. A to letters@tucsoncitizen.com

0818 Email September 23, 2001, 6:45 p.m. A to Oelrichs@rockymountainnews.com

0819 Email September 23, 2001, 7:31 p.m. A to letters@washpost.com

0820(A) Email September 26, 2001, 11:04 a.m. Florin to Pete Seda

0820(B) Letter September 26, 2001, Pete Seda to Senator Wyden

0820(C) Letter Form: Educational Outreach Services (PF)

0821 Letter October 2, 2001, Congressman Greg Walden to Pete Seda

0822 Letter October 2, 2001, Pete Seda to Dear Spiritual Leader

0823 Letter October 5, 2001, Federal Bureau of Investigation Thomas J. Pickard to Pete Seda

0824 Email October 7, 2001, 2:28 p.m. The Arborist to Traci Dow

0825 Email October 7, 2001, 3:05 p.m. A to DBerger and attachment

0826 Email October 14, 2001, 1:16 p.m. Scarlet Ledesma to Pete@TheArborist.com

0827 Reserved

0828 Letter October 24, 2001, Department of the Army, Office of Chief of Chaplins, to Pete Seda

0829 Letter November 19, 2001, Federal Bureau of Investigation to Pete Seda

0830 Email November 27, 2001 2:57 pm, from Peace Hhouse to recipient list

0831 Email November 28, 2001 7:58 am, Victoria Lane to P

0832 Announcement of community benefit concert Saturday, December 1, 2001

0833 Press release March 2002

0833(A) Press Release - Six Month Anniversary of 9/11 (PF)

0834 Email Pete Seda To Pat Florin, March 12, 2002 Al Haramain Press Release (PF) **[replaced with different document]**

0835 Letter March 15, 2002, Pete Seda to Senator Joseph Biden

0835(A) Letter To Biden, March 14, 2002 (PF)

0836(A) Email October 14, 2002, from Florin to Pete Seda

0836(B) Attachment to Email October 14, 2002, from Florin to Pete Seda

0836(C) Letter To Scholars Of The Ummah (PF)

0837 Reserved

0838 Letter November 4, 2002, Pete Seda to Brothers in Al Haramain Islamic Foundation

0839 Letter 10th of Sha'ban 1423 Pete Seda to Scholars of the Ummah

0840 Memo January 28, 2003, Secretary of State Powell from Pete Seda

0840(A) Letter January 28, 2003 from Pete Seda to Charles Matthews seeking Fatwah on Bin Laden

0840(B) Letter To Colin Powell, January 27, 2003 (PF)

0840(C) Letter January 28, 2003 Pete Seda to David Carroll RE Islamic legal case against Osama Bin Laden

0841 - 0852 Reserved

0853 Letter February 14, 2002, United States Department of Justice, Criminal Division, to Pete Seda

0854 Letter July 2, 2002, Pete Seda to Dave Carroll

0855 Consent 10/3/01 for David Carroll to access Al Haramain Bank Account

0856 Photograph Pete Seda with United States UAE Ambassador Michele J. Sison

0857 - 0865 Reserved

0866 Letter April 22, 2002, Pete Seda to Israeli Embassy

0866(A) Email Pat Florin To Pete Seda, Re: Letter re Palestinian Aid (PF), plus attachment

0867 Letter April 22, 2002, Pete Seda to Licensing Division, Office of Foreign Assets Control

0868(A) Email April 22, 2002, P to Florin 4:43 pm

0868(B) Attached letter to Israeli Embassy April 22, 2002

0869 Email April 23, 2002 8:19 am, Brett Schor to P

0870 Letter May 2, 2002, Ambassador Kurtzer to Pete Seda

0871 Emails May 13, 2002, P.S to Benny Dagan

0872 Letter May 14, 2002, Pete Seda to Lorraine Lanlor, Office of Foreign Assets Control

0873 Letter May 14, 2002, Pete Seda to Compliance Division Office of Foreign Assets Control

0873(A) Letter To Office of Foreign Assets Control, Re: Humanitarian Aid For Palestinians (PF)

0874(A) Email May 28, 2002, 1:25 pm P.S to Florin

0874(B) Letter May 28, 2002, Pete Seda to Earl Wall; attachment to May 28, 2002 letter

0874(C) Letter To Earl Wall, CARE, May 28, 2002 (PF)

0875 Letter June 19, 2002, Office of Foreign Assets Control to Martin McMahon, Esquire

0875(A) Email Pat Florin to P.S, June 20, 2002, Benny Dagan (PF)

0876 Letter July 1, 2002, Pete Seda to Richard Newcomb, Office of Foreign Assets Control

0877(A) Email July 2, 2002, 2:10 pm David Berger to Pete Seda

0877(B) Letter July 2, 2002, Pete Seda to Police Chief Scott Fleuter

0877(C) Letter July 2, 2002, to Lieutenant Patten

0878 Letter July 16, 2002, Pete Seda to Israeli Colonel Isaac Gurvich

0879 Letter July 17, 2002, Pete Seda to Ambassador Kurtzer

0880 Letter July 17, 2002, Pete Seda to United States Embassy, Economics Section, Ava Rogers

0881 Letter July 17, 2002, Pete Seda to Deborah Schwartz,
United States Embassy, Israel

0882 Fax July 22, 2002, Ava Rogers, U.S. Embassy to Pete Seda

0882(A) Email Pete Seda to Pat Florin, July 22, 2003 With Ava
Rogers.jpg (PF)

0882(B) Attachment to Ex 882(A), "7 22 02 Ava Rogers.jpg" (PF)

0883(A) Email July 22, 2002, Florin to P.S 11:24 am

0883(B) Letter July 22, 2002, Pete Seda to Ava Rogers, U.S.
Embassy

0883(C) Letter July 22, 2002 Pete Seda to Ava Rogers United States
Embassy Re: Humanitarian Aid in the West Bank and Gaza
(PF)

0884 Letter July 23, 2002, Pete Seda to Ian Barukh, Israeli
Foreign Ministry

0885 Letter July 26, 2002, Rabbi Zaslow

0886(A) Email July 30, 2002, P.S. to David Berger 2:28 p.m.
[replaced with different document]

0886(B) Letter Israeli government July 28, 2002

0887 Fax July 31, 2002, Leah Tsemel to Pete Seda

0888 Letter Pete Seda to Ms. Orley, Israel Defense Forces

0889 Email August 27, 2002, Florin to P.S, with email from P.S to
Florin

0890 Stained Peace of My Heart Aug 2002 (PF)

0891 - 0905 Reserved

0906 Email February 21, 2000, 8:50 p.m. wsra99@aol.com to
P@qf.org

0907 Email March 29, 2000, 11:32 a.m. P to wsra99@aol.com

0907(A) Email March 30, 2000 P to Al Buthe FW: Agreement

0907(B) Email March 30, 2000 P to Al Buthe FW: Agreement with attachment

0908(A) Email October 26, 2001, 4:48 p.m. Sandra Kay to Pete Seda

0908(B) Attached letter, October 26, 2001, to Steve Monroe at Office of Foreign Assets Control

0909(A) Letter November 1, 2001, Pete Seda to Emily Clay at Office of Foreign Assets Control

0909(B) Letter November 2, 2001, Office of Foreign Assets Control to Pete Seda

0909(C) Letter November 1, 2001 Pete Seda to Emily Clay Office of Foreign Assets Control Application for license to distribute food to Afghani refugees (PF)

0910 Email October 9, 2000 P to Al Buthe RE; Tajikistan

0911 Email October 23, 2001 P to Al Buthe RE make it work out - with attachments

0912 - 0924 Reserved

0925 Photograph Pete Seda with truck

0926 Article REGISTER GUARD, "Fate of Big Leaf Maples in Whiteaker Up In The Air"

0927 Email January 20, 2000, 7:41 p.m. Brad and Rooney Riggs to P

0928 Email February 11, 2000, 6:56 p.m. Jim Hartman to Pete Seda

0929 Ashland Watershed Partnership meeting notes March 28, 2000

0930 Email November 17, 2000, 3:08 p.m.: Swales to @mind.net

0931 Email April 11, 2001, 11:56 a.m. Rose Hill to P@qf.org

0932 Email June 24, 2001, 2:13 p.m. The Arborist to Colonel Swales

0933(A) Email October 17, 2001, Representative Greg Walden to Pete Seda

0933(B) Email December 6, 2001, Representative Greg Walden to Pete Seda

0934 Photograph Pete Seda Cleaning Ashland

0935 Photograph Pete Seda On Ladder

0936 Photograph Pete Seda Cleaning with fire people

0937 Photograph The Arborist Crew

0938 Photograph Pete Seda with Governor Kitzhaber

0939 Photograph Pete Seda Cleaning Downtown Ashland

0940-0941 Reserved

0942 Letter To Mayor Cathy Shaw, January 31, 2000 (PF)

0943 Reserved

0944 Hamrick Road Letter, April 20, 2000 (PF)

0945 Reserved

0946 8/8/00 Letter to William Keller (PF)

0947-0955 Reserved

0956 Photograph Pete Seda with children

0957(A) Email March 28, 2000, 3:25 p.m. Q to P@qf.org

0957(B) March 28, 2000 letter Pete Seda to Pastor

0958 Email May 23, 2000, 3:20 p.m. B to P

0959 Email October 22, 2000, 8:57 p.m. Kelly Bennett to Pete Seda Sedaghaty

0960 Email January 24, 2001, 12:13 a.m. P to Shalomrav@aol.com

0961 Email February 23, 2001, 1:56 p.m. Stan Way to P@qf.org

0962 Email May 11, 2001, 10:12 a.m. James Y. Horton to P@qf.org

0963 Email May 21, 2001, 2:22 p.m. Pam Long to P@qf.org

0964 Email May 22, 2001, 11:31 a.m. Peace House to Pete Seda et. al.

0965 Email July 02, 2001, 12:53 a.m. Pete Seda to BLJ_maj@yahoo.com

0966 Photograph Class at Al Haramain [replaced with a complete version]

0967 Photograph class at tent

0968 Photograph multi-cultural fair

0969 Photograph Religion Class at tent

0970 Photograph presentation at church

0971 Email Jane Claussen to P at QF.org, January 2, 2002

0972(A) Email January 21, 2002, 1:50 pm, P to Florin

0972(B) Attachment letter for Peace House

0973 Bi-line article: Islamic Show Intrigues RCC, February 2002

0974 Email February 1, 2002, Drake, Tommy to P at QF.org, 10:47 am

0975 Email February 5, 2002, Closter, Larry to Q.

0976 Photograph Pete Seda In Church

0977 Photograph of Pete Seda lecturing to students

0978 Photograph Pete Seda in Rabbi Zaslow's Temple

0979-0986 Reserved

0987 Email April 11, 2000, 8:13 a.m. B to P@qf.org

0988 Email March 13, 2002, Stan Way to P

0989(A) Email April 19, 2002, P to Florin

0989(B) Attached letter to Senators and Reps

0990 Booklet Islam Is by Pete Seda

0991 Islamic T-Shirt

0992 - 1001 Reserved

1002 Pete Seda Video Statistics

1002(A) Pete Seda Video compilation CD

1002(B) Chechnya video compilation CD

1003 Summary of prisoner letters (to be created)

1004 Letter and Check \$300 November 15, 1999

1005 Check \$50 November 20, 1999

1006 Check \$100.00 November 20, 1999

1007 Check \$100.00 December 1, 1999

1008 Money order \$300 December 6, 1999

1009 Check \$400.00 December 20, 1999

1010 Check \$200.00 January 1, 2000

1011 Check and Envelope \$600.00 January 5, 2000

1012 Check \$150.00 January 19, 2000

1013 Check \$68.00 January 22, 2000

1014 Checks \$50,000.00, \$4,000.00, \$196.75 January 21, 2000

1015 Check and Deposit ticket February 23, 2000

1016 Check dated December 24, 1999, \$2,000.00

1017 - 1023 Reserved

1024 Photograph of Shrubbery

1025(A) Photograph of wire

1025(B) Photograph of wire

1026 Photograph of former President George W. Bush with Saudi Crown Prince Abdullah

1027 Copies of Receipt No. 418933 and Receipt No. 15881 written in Arabic

1028 Video report concerning activities of Al Haramain Medical Committee from 1999 (to be submitted under separate cover)

1028(A) 2 Minute Video Summary of 1028

1029 Patricia Florin document list

1030 Chase Bank deposit ticket dated March 25, 2000

1031 Chechnya donations

1032 - 1033 Reserved

1034 Photograph of interior of trailer searched

1035 - 1046 Reserved

1047 Photograph of interior of trailer searched, specifically depicting a box of "Pete's . . . tapes."

1048 -1053 Reserved

1054 Letter from Donald Stine, Chaplain, to Qu'ran Foundation, December 7, 1999

1055 Letter from Chaplain Denis K. Burrell to Alharamain Islamic Foundation, February 24, 2000

1056 Letter from Donald Stine, Chaplain, to Qu'ran Foundation, March 23, 2000

1057 Letter from Andrew Leatherman, Chaplain, to Al Haramain Foundation, July 19, 2000

1058 Email from Sgt. Vito D. Deure, U.S. Army Chaplain, to haramain@alharamain.org July 27, 2000

1059 Letter from Robert Thomas, Chaplain, to Al Haramain Islamic Foundation, August 1, 2000

1060 Letter from James E. Penn, Chaplain, to Quran Foundation, August 15, 2000

1061 Letter from Rev. Steve Gadaire, Chaplain, to Al Haramain Foundation USA, August 16, 2000

1062 Letter from Mitch Anderson, Chaplain, to Al Haramain Foundation, February 21, 2001

1063 Letter from Joe T. Portugal, Chaplain, to Al Haramain Foundation, April 9, 2002

1064 Demonstrative Exhibit of QuickBooks Activity

1065 Springfield Building Schedule per Jeff Cone

1201 Email from WesternSom to a@qf.org, February 9, 1999 at 9:13 p.m.

1201(A) Urgent Appeal Kosova, April 2, 1999, faxed to Al Haramain on April 2, 1999

1201(B) Time Sheet of Mr. Gartenstein-Ross for April 1999

1201(E) "Give Five Minutes For Kosova," Kosova Task Force, USA, Justice for All

1201(F) Check written to Kosova Task Force, USA, dated April 2, 1999

1210 Email Exchange between Mr. Gartenstein-Ross and Soliman Al Buthe, May 4th and 5th, 1999

1215 Request for Assistance from the Uma Women Society, dated December 23, 1999

1216 Email exchange between Mr. Gartenstein-Ross and Soliman Al Buthe, March 5, 2000

1238 Excerpt of Wilcox Working Papers Presented During Testimony

1238(A) Check \$21,000 #9624

1238(B) Check \$131,300 #9456
1238(C) Check \$10,000 #9002
1238(D) Check \$318,291.74 #9733
1238(E) Reconciliation Report

Respectfully submitted on September 7, 2010.

/s/ Steven T. Wax
Steven T. Wax
Federal Public Defender

/s/ Lawrence H. Matasar
Lawrence H. Matasar